

FILED

UNITED STATES DISTRICT COURT

2022 AUG 30 AM 9:56

for the

Middle District of Tennessee

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

____ Division

Waynetta Patterson

Case No.

3:22-cv-0299

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Wayne Halfway House, LLC et al.,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Amended

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Waynetta Patterson
Street Address	117 McKinley Street
City and County	Madison, Davidson
State and Zip Code	Tennessee 37115
Telephone Number	615-586-9790
E-mail Address	waynettapatterson33@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Albert Mendoza
Job or Title <i>(if known)</i>	Facility Administrator
Street Address	3981 Stewarts Lane
City and County	Nashville, Davison
State and Zip Code	Tennessee 37218
Telephone Number	(615) 686-2022
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Erika Kemble
Job or Title <i>(if known)</i>	HR Assistant
Street Address	3981 Stewarts Lane
City and County	Nashville, Davidson
State and Zip Code	Tennessee 37218
Telephone Number	(615) 686-2022
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Brandy Gaskins
Job or Title <i>(if known)</i>	Youth Service Supervisor
Street Address	3981 Stewarts Lane
City and County	Nashville, TN
State and Zip Code	Tennessee 37218
Telephone Number	(615) 686-2022
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Elizabeth McCown/Hollis Academy
Job or Title <i>(if known)</i>	Staff Development Instructor
Street Address	3981 Stewarts Lane
City and County	Nashville, Davidson
State and Zip Code	Tennessee 37218
Telephone Number	(615) 686-2022
E-mail Address <i>(if known)</i>	

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	Standing Tall Music City
Street Address	3981 Stewarts Lane
City and County	Nashville, Davidson
State and Zip Code	Tennessee 37218
Telephone Number	(615) 686-2022

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law *(specify the federal law)*:



Relevant state law *(specify, if known)*:



Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☒ Other acts *(specify)*: Harassment/Segregation

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
10/2019-4/2020

C. I believe that defendant(s) *(check one)*:

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☒ race _____
- ☒ color _____
- ☐ gender/sex _____
- ☐ religion _____
- ☐ national origin _____
- ☐ age *(year of birth)* _____ *(only when asserting a claim of age discrimination.)*
- ☐ disability or perceived disability *(specify disability)* _____

E. The facts of my case are as follows. Attach additional pages if needed.

I have attached the facts of my case on an additional page.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

5-6-2020-11-3-2020

- B. The Equal Employment Opportunity Commission *(check one)*:

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on *(date)* 04/07/2022.

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☐

60 days or more have elapsed.

☐

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I have attached an additional page for my relief.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/13/2022

Signature of Plaintiff

Printed Name of Plaintiff

Waynetta Patterson
Waynetta Patterson

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Additional Pages in Accordance with Pro Se 7 (Rev 12/16) Complaint for Employment Discrimination

Additional Defendants

Defendant No.5

Name	<u>Larry Morrisett</u>
Job or Title (<i>if known</i>)	<u>COO</u>
Street Address	<u>3981 Stewarts Lane</u>
City and County	<u>Nashville, Davidson</u>
State and Zip Code	<u>Tennessee 37218</u>
Telephone Number	<u>615-686-2022</u>
E-mail Address (<i>if known</i>)	<u></u>

Defendant No. 6

Name	<u>Alan White</u>
Job or Title (<i>if known</i>)	<u>Human Resources Director</u>
Street Address	<u>3981 Stewarts Lane</u>
City and County	<u>Nashville, Davidson</u>
State and Zip Code	<u>Tennessee 37218</u>
Telephone Number	<u>615-686-2022</u>
E-mail Address (<i>if known</i>)	<u></u>

III.: Statement of Claim

My statement of claim is that I have been a victim of employment discrimination by the stated Defendants:

1. **Wrongfully terminated.** I was terminated 4/17/20 because of my race and color which is African American and black. I was terminated by Defendant No. 1, who was not my immediate supervisor, but was allowed to terminate me. But Defendant No. 1 terminated me to allow Defendant No. 3, which is white to replace me. Before my termination, it was stated in a prior faculty meeting (3/18/20) by Defendant No. 1 & 5, "they want to change the culture of the facility to make it better." The facility is 95% African American and although, we were hiring different races and colors for the diversity, people were quitting within a week or month of various reasons. Not to mention, I was not the only African American employee that they replaced with a white employee. These defendants falsified reasons for termination to fulfill the positions for white employees.
2. **Retaliation.** All Defendants listed found ways to retaliate against me because I reported policy violations for Department of Children's Services and the company. I was retaliated against because I stood my ground to follow the company policy and state regulations during the training process, hiring, certifications, drug screening, HIPPA, youth rights, documentation and recording, termination, etc. When I reported any violations to corporate or the designated employee, I was overlooked, ignored, laughed at, treated even more harsh, overtime taken, lack of communication, and now terminated.
3. **Harassment.** Defendants 1, 2, 3, 5, & 6 harassed me constantly until it became so intolerable that I had to take longer than usual time in my office or in my training classes to find ways to calm down, cry, pray, study my Bible, hide, etc. I would leave campus to go to the park on my lunch, not to eat but to cry and pray. Or even contact my therapist for a level of comfort. I loved this position. I could not get them to provide the documents, communicate with me regarding my training classes, they would abruptly interrupt my training classes for irrelevant reasons, harassed the new employees, was very aggressive and disrespectful to me in front of the new employees. I reported these actions to corporate and yet I was ignored and laughed at. I even asked are they trying to force me to quit my job because I do not see where I am doing anything wrong. I did not have any write ups or anything.
4. **Segregation.** I witness Defendants 1,2,3, & 5 come in my training class in 4/20 and call the white employees out to provide them a better position to work from the African American employees, when they were hired for another position. This caused so much attention, 2 African American employees quit in the same week. And I was disrespected and reprimanded in front of the class and was told to "shut up and train, that's all I am supposed to do," when I explained what position, everyone was hired for in the facility.
5. **Unequal terms and conditions of my employment.** I followed every policy I could to the best of my ability and knowledge. I was the trainer, so I had to practice what I preached. And if I was wrong, I corrected myself. However, each week there was always a change to my classes that did not accommodate the new employees or my schedules. I requested a standard weekly shift because I was told to be on call to train new employees any time or day but would not be paid overtime if it was beyond the 40 hours. After weeks of explaining, I was finally awarded the standard week, but I still had to train with no pay. I even was called and harassed outside of working hours about training employees when I requested to contact me during working hours. But when another employee was white, requested her schedule or anything she needed was with ease. I was always given the third degree I was given the run around when I needed authorization for certification, drug screening, hiring, termination, and so on. But it was always easy for the white employees. I had to email a specific person in corporate, who was white, to get authorization or a response. Most times I just figured it out to keep a level of peace. I didn't understand.
6. Last, Defendant 4, has posted racial material to my Facebook page from 4/20-7/20. I have attached with this Statement of Claim. I was devastated and hurt. A person knows when they are discriminated against, it's not just words but the actions that come from the heart and mind of another person to hurt them maliciously. I love everyone and would help anyone despite who they were.

E. The Facts of My Case.

In November 2019, I was promoted to the Staff Development Instructor for the Standing Tall Music City location for the purpose of training the new employees. Elizabeth McCown, Staff Development Instructor for the Waynesboro location, trained me enough to stand on my own. During this training I was told by Ms. McCown that she has never trained black people at her location and the ones here is acting like a bunch of monkeys. She stated they don't hire black people at the Hollis Academy. She stated she was nervous. I requested to become the trainer for this location because she couldn't anymore. It was approved by Jason Crews, Executive Director, for Wayne Halfway House, LLC et al. Between 4/2020-6/2020, Ms. McCown posted racist material on my page. I have attached with this packet.

In November 2019, I met Erika Kemble, Human Resource Assistant, I was told that I reported to her as my supervisor. Which I was told by Ms. McCown that I report to Mr. Alan White, Human Resource Director, located in Waynesboro, TN. Things were good at the beginning until December 2019 when I was harassed over the weekend through email and phone about Brandy Gaskins who she wanted me to train starting on Tuesday. They were never this persistent about any other employee being hired. I explained to Ms. Kemble that I am not allowed to work after hours, and I was with my mom who was sick, and I will respond on Monday. I attached Mark Johnson, the Facility Administrator at that time, to the email and texts. After this incident, Ms. Kemble began retaliating against me. On 12/24, I requested employee schedules so I could begin In-Service Training, she ignored me and refused to provide this information. I even requested for her to complete her Pre-Service Training and she refused. On 2/17/20, Ms. Kemble knew we had a HR meeting and intentionally did not tell me. I had to get the information from Defendant 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 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1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1040, 1041, 1042, 1043, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1104, 1105, 1106, 1107, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 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her Pre-Service folder, but she refused CPR Training and HWC Training. In addition, on 3/5/20, I have requested employee information, she spitefully refused to provide the information for Emilee Hunter. On this same day, I created a proposal for a hiring event, and I was told in our faculty meeting with corporate to give it to Ms. Kemble because she is the face of Standing Tall Music City, and it would be better this way. On 3/16/20, I had to create an Employee Waiver Form because Ms. Kemble was forcing me to pass employees through without training and certifications and this a violation of the company policy and Department of Children's Services. I composed and sent an email to Ms. Kemble expressing my concerns because the mistreatment was becoming worse and on 3/18/20, she stated she will not read my email. On 4/9/20, I addressed Ms. Kemble about missing time, and she ignored me. On 4/15/20, I contacted Mr. Alan White report this behavior yet again, and I was ignored, and he laughed at me so I hung up and went to the bathroom and cried until I couldn't cry any more. I contacted Mr. Tom Irwin and expressed my concern, and I never received a follow up. I received constant malicious retaliation, harassment, and discrimination from Ms. Kemble.

Last, the remaining three defendants, Alberto Mendoza (Facility Administrator), Brandy Gaskins (Youth Service Supervisor), and Larry Morrisett (COO) worked maliciously and intentionally to force me to quit but had to wrongfully terminate me instead. Brandy Gaskins was hired 1/20 as a Youth Service Supervisor and she refused to complete CPR training with me, she stated her boyfriend (Alberto Mendoza) is certified and she rather do it with him. Ms. Gaskins was allowed to perform duties beyond her job description because she was affiliated with Alberto Mendoza when he was hired 3/20. Ms. Gaskins and I did not speak much because she was aggressive in the training class, interrupting my class with negative comments, and to avoid this behavior, I still treated her with respect, but I engaged only when I had to. Alberto Mendoza, also, attended my training class with a cocky, arrogant, and aggressive attitude. When I needed him to introduce himself for the class, he told me he does not have to tell me who he is I will find out later. The class became agitated with his response and stated they can't work with anyone like this. And one of the black employees quit during break. I went to my office and cried. I told Mr. Tom Irwin how he was treating staff and the youth. Alberto Mendoza and Brandy Gaskins walked around the facility causing an intolerable and hostile environment for the staff and even the youth. They segregated the youth on the dorms, by disrupting the black youth and protecting the white youth. He was aggressive with the black staff and not with the white. Alberto Mendoza was not my immediate supervisor yet; I was told to report to him. He ignored any concerns for training class even when requested information to conduct the mandatory In-Service Training for months, but I was ignored once again. Ms. Gaskins was allowed to conduct the training with no problems. Alberto Mendoza harassed me during my training classes by abruptly interrupting my class for frivolous reasons or to call a white employee out to provide better positions despite what they were hired for. If the class was all black, he would not come to disrupt my class. Last, Alberto Mendoza and Larry Morrisett stated in a meeting (3/18/20) that there need to be a culture change to make it better and when we asked what that means, they ignored the staff. All we know, black employees were being replaced in Administration with white employees, including myself. These are some of the incidents. On different occasions along with Phlonda Davis contacted corporate regarding the discrimination and the performance of Mr. Mendoza, Ms. Gaskins, and Mr. Morrisett and he stated that corporate was fully aware of their behavior because I am not the only one reporting on them. Trying to report through HR was hard because Ms. Kemble would not provide forms, or the information was not confidential. So, everyone contacted corporate.

These are some of true events that happened that I noted from my recordings of evidence to the best my ability.

V. Relief

I am seeking any lost wages, punitive damages, and emotional distress while I was employed and during this process. I am requesting at least \$75,000 because of the following reasons:

- o My Family- I am the Head of Household – 2 Children, 4 Grandchildren (my income was supporting my family). To figure out how to take care of my home during this period was stressful and put me in a financial hardship beyond compare.
- o The mental and emotional distress for being a target for the malicious harassment, retaliation, and discrimination acts were intolerable on and off the clock.
- o Loss of my overtime to perform my job efficiently.
- o Loss of Employment which is my source of income.
- o Loss of Vehicle
- o Shelter Costs and Utilities
- o Wrongful Termination- I had no recorded write ups or reprimands.
- o The defamation of character

No one deserved to be treated like this. I reached out to the appropriate staff as the policy stated and unfortunately, I was ignored and treated worse. I was dedicated to my job, but I refuse to violate policies that would bring on consequences to the company or staff or the people we service. I would not mistreat anyone for any reason no matter who they are. I never received a write up for the reasons they terminated me for. I have provided this information to receive the compensation I deserve for what I encountered.

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 494-2020-01752	
TENNESSEE HUMAN RIGHTS COMMISSION and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) MISS WAYNETTA PATTERSON		Home Phone (615) 586-9790	Year of Birth
Street Address City, State and ZIP Code 117 MCKINLEY STREET, MADISON, TN 37115			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name STANDING TALL MUSIC CITY		No. Employees, Members 15 - 100	Phone No. (615) 686-2022
Street Address City, State and ZIP Code 3981 STEWARTS LANE, NASHVILLE, TN 37218			
Name		No. Employees, Members	Phone No.
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 10-17-2019 04-17-2020 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I worked for the above-named employer as a Self-Development Instructor from October 14, 2019 until my termination on April 17, 2020. The employer has more than fifteen employees. During my employment, I was subjected to harassment and different terms and conditions of employment than others not of my race(black). I filed an ethics report with corporate due to the treatment of myself and others of my race (black) including the race(black) children in our care. After my complaint, a meeting was called, and, in the meeting, management spoke about working on changing the culture. The employees asked what is meant my culture and no one in management could give any explanation. I also handed out grievance forms due to the conduct of management. I was terminated on April 17, 2020 and was told my termination was due to performance, conduct towards staff and negative culture. I feel that my termination was in retaliation for the ethics complaint and my continuing actions of advocating for a non-discriminatory work-place for myself and other race(black) employees.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.		NOTARY - When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
Digitally signed by Waynetta Patterson on 11-03-2020 02:23 PM EST			

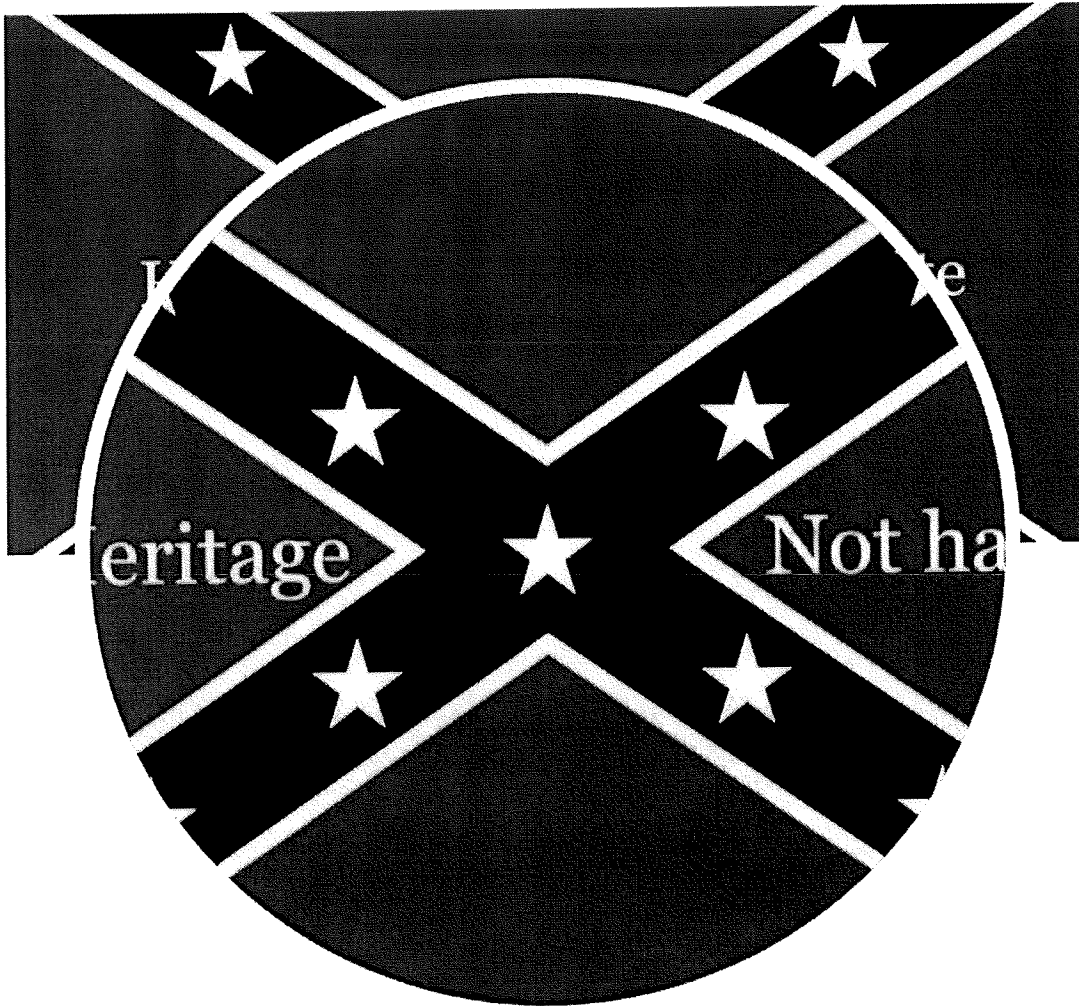
<p align="center">CHARGE OF DISCRIMINATION</p> <p>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: Agency(ies) Charge No(s):</p> <p><input type="checkbox"/> FEPA</p> <p><input checked="" type="checkbox"/> EEOC 494-2020-01752</p>
<p align="center">TENNESSEE HUMAN RIGHTS COMMISSION _____ and EEOC</p> <p align="center"><i>State or local Agency, if any</i></p>	
<p>I feel that I have been discriminated and retaliated against in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>	

<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY - <i>When necessary for State and Local Agency Requirements</i></p>
<p>I declare under penalty of perjury that the above is true and correct.</p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p>
<p align="center">Digitally signed by Waynetta Patterson on 11-03-2020 02:23 PM EST</p>	<p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE</p> <p><i>(month, day, year)</i></p>



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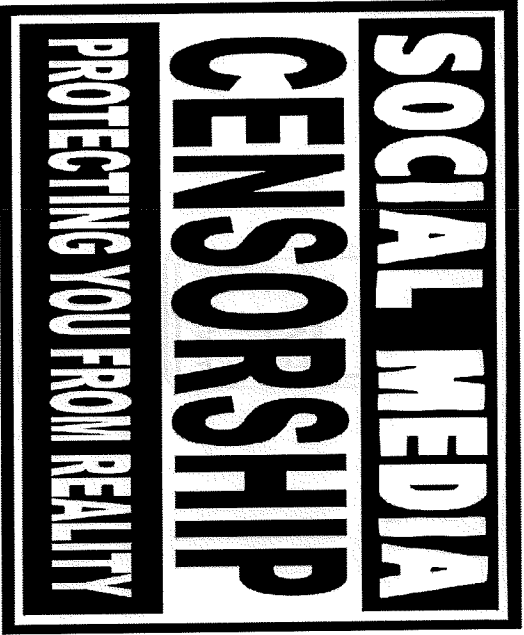
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